

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

ZOEPEAWON MOORE, a/k/a
ZOE MOORE, a/k/a CHIEF EXECUTIVE

INDICTMENT

Case No. _____

Violation: 21 U.S.C. § 846

Conspiracy to Possess with Intent to Distribute and Distribute a Controlled Substance

The Grand Jury Charges:

From in or about January 2020 through February 2021, in the Districts of North Dakota, Minnesota, California, and elsewhere,

ZOEPEAWON MOORE, a/k/a ZOE MOORE, a/k/a CHIEF EXECUTIVE, did knowingly and intentionally combine, conspire, confederate, and agree together and with others, both known and unknown to the grand jury, to possess with intent to distribute and distribute a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

Overt Acts

In furtherance of this conspiracy and to effect and accomplish the objects of it, one or more of the conspirators committed the following overt acts:

1. It was a part of said conspiracy that the defendant and others did agree and attempt to possess with intent to distribute and distribute a mixture and substance containing

a detectable amount of marijuana, a Schedule I controlled substance, in North Dakota, Minnesota, California, and elsewhere;

2. It was further a part of said conspiracy that the defendant and others would and did attempt to conceal their activities;

3. It was further a part of said conspiracy that the defendant and others would and did use telecommunication facilities;

4. It was further a part of said conspiracy that the defendant and others would and did use United States currency in their drug transactions;

5. It was further a part of said conspiracy that co-conspirators would and did use and possess firearms to further the conspiracy; and

6. It was further a part of said conspiracy that co-conspirators used violence and the threat of violence to further the conspiracy;

All in violation of Title 21, United States Code, Section 846; Pinkerton v. United States, 328 U.S. 640 (1946).

A TRUE BILL:

/s/ Foreperson

Foreperson

/s/ Jennifer Klemetsrud Puhl

JENNIFER KLEMETSRUD PUHL

United States Attorney

CCM:ld